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December 10, 2013

Via ECF and First-Class Mail

The Honorable Madeline C. Arleo
U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

**Re: Care One Management, LLC et al. v. UHWE, SEIU 1199 &
NEHCEU, District 1199 (Civil Action No. 2:12-cv-06371)**

Dear Judge Arleo:

We represent Defendants in the above-styled case and write to respond to a letter from Plaintiffs' counsel filed earlier today, requesting that Your Honor schedule a Rule 16 scheduling conference. As we informed Plaintiffs' counsel this afternoon, we are currently drafting a motion to stay discovery on behalf of Defendants, which we will file with the Court by Monday, December 16. That motion, which will request that the Court stay discovery until the Court rules on Defendants' forthcoming motion to dismiss Plaintiffs' Amended Complaint, will be heard before The Honorable Judge Wigenton and, *inter alia*, will respond to the arguments made in Plaintiffs' counsel's letter.

The Honorable Madeline C. Arleo
Page 2
December 10, 2013

We respectfully request that Your Honor wait to schedule a Rule 16 conference until Judge Wigenton rules on Defendants' motion to stay discovery.

Respectfully submitted,

/s/ Leon Dayan

Leon Dayan
Counsel for Defendants

CC: The Honorable Susan D. Wigenton
All Counsel of Record (by ECF)